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*Attorneys for Defendant
Walmart, Inc.*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA AT ANCHORAGE

NORMA HIRATSUKA,)
)
Plaintiff,)
v.)
)
WALMART, INC. d/b/a WALMART)
SUPERCENTER #2071,)
)
Defendants.)

**NOTICE OF REMOVAL TO
FEDERAL COURT**

Case No. 3:20-cv_____

TO: The United States District Court
For the District of Alaska

AND TO: Whitney A. Power
Power & Power Law, LLC
10950 O'Malley Centre Dr. Suite C
Anchorage, AK 99515

Please accept this as notice that, pursuant to 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446, the above defendant, WALMART, INC. hereby files in the United States District Court for the District of Alaska this Notice of Removal of the following action: *Hiratsuka v. Walmart, Inc. d/b/a Walmart Supercenter #2071*, filed in the Superior Court for the State of

Alaska, Third Judicial District at Anchorage, Case No. 3AN-19-10919CI. Said defendant has filed a copy of this Notice with the Clerk of the Superior Court for the Third Judicial District at Anchorage, and said action has thereby been removed from the Superior Court to this United States District Court. (Ex. A)

The grounds for removal are as follows: Complete diversity of citizenship. 28 U.S.C. §§ 1331, 1332(a)(1), 1441 and 1446. Plaintiff is a resident and citizen of the State of Alaska (Ex. B, Complaint at p.1). Defendant, Walmart, Inc. is a Delaware corporation whose principal place of business is in Arkansas, and is therefore a citizen of Delaware and Arkansas. Accordingly, there is complete diversity of citizenship amongst the parties.

Plaintiff's complaint seeks damages of \$75,000 or more.

This removal is being filed within thirty (30) days after service of the complaint against Walmart, Inc. on December 19, 2019.

Based on the above, this court has removal jurisdiction over this action, and defendant Walmart, Inc. is entitled to remove this action to this Court from the Superior Court for the State of Alaska.

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DATED this 14th day of January 2020, at Anchorage, Alaska.

RICHMOND & QUINN
*Attorneys for Defendant
Walmart Stores, Inc.*

By: s/ Kenneth M. Gutsch
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CERTIFICATE OF SERVICE

I HEREBY certify that on the 14th day of January 2020,
a copy of the foregoing was served by ECF upon:

Whitney A. Power
Power & Power Law, LLC
10950 O'Malley Centre Dr. Suite C
Anchorage, AK 99515
wpower@akpowerlaw.com

s/ Kenneth M. Gutsch
RICHMOND & QUINN
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NOTICE OF REMOVAL

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